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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
DENNIS AHLGRIM, TINA SHEPPARD and
AHLGRIM SHEPPARD, INC.

Plaintiffs,

-against-

DWAYNE FLINCHUM, and
IRIDIUM GROUP, INC.,

Defendants.
-----X

Docket No.: 07-CV-4002 RJH

ECF CASE

COMPLAINT

Plaintiffs Dennis Ahlgrim, Tina Sheppard, and Ahlgrim Sheppard, Inc. ("Plaintiffs"), by their attorneys, The Ottinger Firm, P.C., for their Complaint against Dwayne Flinchum, and Iridium Group, Inc., (Defendants") allege as follows:

JURISDICTION AND VENUE

1. This is an action for violations of the Anti-Cybersquatting Consumer Protection Act, Section 43(d) of the Lanham Act, 15 USC §1125(d); unfair competition and false designation of origin under §43(a) of the Lanham Act, 15 USC §1125(a); unfair competition under New York State Law; violation of §349 of the New York General Business Law; and violations of Section 50 and 51 of the New York Civil Rights Law. Plaintiffs seek an order directing the transfer of the domain names below and all other similar and/or confusing domain names, permanent injunctive relief, and an award of money damages and attorneys' fees based

on Defendants' wrongful conduct.

2. This Court has original jurisdiction over Plaintiffs' federal claims pursuant to 28 USC §1331 and 1338 and 15 USC § 1121. This Court has supplemental jurisdiction pursuant to 28 USC §§1338 and 1367 with respect to Plaintiffs' claims arising under the laws of the State of New York, including those arising under the New York General Business Law and New York Civil Rights Law.

3. Venue is proper in this district pursuant to 28 USC §1391 because this is an action brought pursuant to the Lanham Act, Plaintiffs' claims arise in this district, a substantial part of the events giving rise to the claims occurred in this district and Defendants do business within this district and reside in this district.

4. This Court has personal jurisdiction over Defendants because they are present in this district, reside in this district, and engage in substantial business within this district.

THE PARTIES

5. Plaintiff Dennis Ahlgrim is a former employee of Defendant Iridium Group, Inc., and resides in Brooklyn, New York.

6. Plaintiff Tina Sheppard is a former employee of Defendant Iridium Group, Inc., and resides in New York, New York.

7. Plaintiff Ahlgrim Sheppard Inc., is a New York corporation.

8. Upon information and belief, Defendant Dwayne Flinchum ("Flinchum") is President and CEO of Iridium.

9. Upon information and belief, Defendant Iridium Group, Inc., is a New York corporation, with its principal place of business in New York, New York.

FACTS

10. Plaintiff Dennis Ahlgrim was employed by Iridium Group, Inc., from December, 2001, through February, 2007.

11. Plaintiff Tina Sheppard was employed by Iridium Group, Inc., from February, 2006, through February, 2007.

12. On December 23, 2006, Plaintiffs Ahlgrim and Sheppard purchased the domain name www.ahlgrimsheppard.com.

13. Plaintiffs Ahlgrim and Sheppard started a strategic visual communication business, called "Ahlgrim Sheppard" and as part of that business, on March 8, 2007, Plaintiffs Ahlgrim and Sheppard incorporated the name Ahlgrim Sheppard Inc.

14. On or about March 28, 2007, Plaintiffs Ahlgrim and Sheppard were sued by Defendant Iridium for alleged breach of contract, in Supreme Court, New York County, Index No. 601024/07.

15. On April 23, 2007, Plaintiffs Ahlgrim and Sheppard answered and counterclaimed.

16. On May 5, 2007, Plaintiffs Ahlgrim and Sheppard found out that on or about April 11, 2007, the Defendants, or people acting on their behalf, registered over ten domain names, all containing Plaintiffs' names. Annexed hereto as Exhibit "A" are true and correct copies of representative examples of "Whois" records of domain names owned by Defendants and annexed hereto as Exhibit "B" are true and correct copies of web pages and screenshots of the Defendants' website that appears when any of the above domain names are entered.

17. The Defendants had no authorization to use Plaintiffs names, nor to register or use

domain names confusingly similar to Plaintiffs' name.

18. Upon information and belief, Defendants have trafficked in the above referenced domain names.

19. Some of the domain names ("domain names") purchased include:

<http://www.dennisahlgrim.com/>
<http://www.ahlgrimdesign.com/>
<http://www.sheppard-ahlgrim.com/>
<http://www.sheppardahlgrim.com/>
<http://www.ahlgrim-sheppard.com/>
<http://www.ahlgrimsheppard.net/>
<http://www.ahlgrimsheppard.org/>
<http://www.ahlgrimshepparddesign.com/>
<http://www.tinashepparddesign.com/>
http://www.dennisahlgrimdesign.com

20. Anyone typing the above mentioned domain names into a computer are automatically diverted to Iridium's website (<http://www.ir77.com/>).

21. Upon information and belief, the above list is not exhaustive. Rather, Defendants, or third parties acting on their behalf, have registered other similar names that Plaintiffs are unaware of.

FIRST CAUSE OF ACTION
BAD FAITH REGISTRATION OF DOMAIN NAME
AND CYBERSQUATTING (15 USC §1125(d))

22. Plaintiffs repeat, reiterate and reallege each and every allegation set forth in paragraphs "1" through "19" with the same force and effect as if the same were set forth herein.

23. Defendants registered the domain names with a bad faith intent to exploit the goodwill of the Plaintiffs, in violation of the Anticybersquatting Consumer Protection Act, Section 43(d) of the Lanham Act, 15 USC §1125(d).

24. Upon information and belief, the domain names--- were registered by Defendants or a third party acting on Defendants' behalf with knowledge of Plaintiffs' rights to their names.

25. Upon information and belief, Defendants have acted with the bad faith intent to profit (within the meaning of Section 43(d) of the Lanham Act) from the distinctive names of the Plaintiffs by directly diverting all traffic to Iridium's website.

26. The registration and/or use of the domain name thus constitutes acts of cyberpiracy in violation of Section 43(d) of the Lanham Act, 15 USC §1125(d).

27. Defendants' willful conduct in registering domain names that are identical to and/or confusingly similar to and/or dilutive of Plaintiffs' mark, with the bad faith intent to profit from said domain names, constitutes unlawful cybersquatting in violation of Section 43(d) of the Lanham Act, 15 USC §1125(d).

28. Such conduct on the part of Defendants has caused and will continue to cause irreparable injury to Plaintiffs, for which Plaintiffs have no adequate remedy at law.

SECOND CAUSE OF ACTION
FOR RELIEF FOR FEDERAL UNFAIR COMPETITION, FALSE DESCRIPTION AND
FALSE DESIGNATION OF ORIGIN (15 USC §1125(a))

29. Plaintiffs repeat, reiterate and reallege each and every allegation set forth in paragraphs "1" through "28" with the same force and effect as if the same were set forth herein.

30. Internet users presented with the domain names mentioned above will associate the domain names and/or web page with Plaintiffs and are likely to be confused and believe that Plaintiffs have authorized the registration of the domain names or have endorsed or are otherwise associated with Defendants' website accessed through the domain name and redirected to Defendants' website.

31. The domain names are deceptive, not only because they contain the names of the

Plaintiffs but because they automatically redirect all traffic to Iridium's website.

32. By the acts described above, the domain names are being used in unfair competition in violation of 15 USC §1125(a).

THIRD CAUSE OF ACTION
COMMON LAW UNFAIR COMPETITION

33. Plaintiffs repeat, reiterate and reallege each and every allegation set forth in paragraphs "1" through "32" with the same force and effect as if the same were set forth herein.

34. Defendants' unauthorized use of the domain names is with the intent to confuse the public and to trade on the goodwill embodied in Plaintiffs' names.

35. Defendants' unauthorized use of the Plaintiffs' names and confusingly similar variations thereof, in connection with their website constitutes unfair competition because such use is (a) designed and intended to confuse and mislead potential and actual clients of Plaintiffs; (b) subjects Plaintiffs unwillingly to be associated by clients with Defendants' services or goods without any ability for Plaintiffs to supervise and control the nature or quality thereof; (c) is a willful taking of the goodwill and reputation created by Plaintiffs' efforts, without contribution by Defendants; (d) prevents Plaintiffs from using their well known names and variations thereto, for an internet domain name; and (e) enriches Defendants at Plaintiffs' expense. Defendants' conduct is likely to cause confusion as to the origin and source of their services and will cause the public to believe that Defendants' services originate with or are otherwise authorized by Plaintiffs, or that Plaintiffs and Defendants are somehow affiliated or related.

36. By reason of the foregoing, Defendants have willfully violated and are continuing to violate Plaintiffs' rights under New York common law. Defendants' conduct is causing irreparable injury to Plaintiffs, and to their goodwill and reputation and will continue both to

damage Plaintiffs and deceive the public unless permanently enjoined by this Court.

FOURTH CAUSE OF ACTION
VIOLATION OF NEW YORK CIVIL RIGHTS §§50-51

37. Plaintiffs repeat, reiterate and reallege each and every allegation set forth in paragraphs "1" through "36" with the same force and effect as if the same were set forth herein.

38. By reason of the foregoing, Defendants' unlawful conduct constitutes the willful use of Plaintiffs' names, for commercial or trade purposes, without permission in violation of N.Y. Civ. Rights Law §§50-51.

39. Such conduct on the part of the Defendants has caused and will continue to cause irreparable injury to the Plaintiffs, for which Plaintiffs have no adequate remedy at law.

40. Defendant used Plaintiffs names, for purposes of trade or advertising, without Plaintiffs' written consent. Such conduct on the part of Defendants has caused and will continue to cause irreparable injury to Plaintiffs, for which Plaintiffs have no adequate remedy at law.

FIFTH CAUSE OF ACTION
NEW YORK GENERAL BUSINESS LAW §349

41. Plaintiffs repeat, reiterate and reallege each and every allegation set forth in paragraphs "1" through "40" with the same force and effect as if the same were set forth herein.

42. By reason of the foregoing, Defendants' willful conduct as alleged above constitutes deceptive acts and practices in the conduct of its business, in violation of §349 of the General Business Law of the State of New York.

43. Such conduct on the part of Defendants has caused and will continue to cause irreparable injury to Plaintiffs, for which Plaintiffs have no adequate remedy at law.

WHEREFORE, Plaintiffs respectfully request that this Court enter a judgment against Defendants as follows:

1. That Defendants and any applicable domain name registrar or registry be ordered to transfer to Plaintiffs all domain names registered by Defendants that are confusingly similar to the Plaintiffs' names, within 15 days of entry of judgment;

2. That Defendants and their officers, agents, servants, employees, attorneys, successors, affiliates and assigns and all those persons in active concert or participation with all or any of them, who receive notice of this judgment, be permanently enjoined and restrained from;

- (a) using or authorizing any third party to use any trademark, service mark, domain name, keyword, business name or trade name consisting in whole or in part of the Plaintiffs' names;
- (b) making or displaying any statement or representation that is likely to lead the public or trade to believe that Defendants' services or internet websites are in any manner associated or affiliated with or approved, endorsed, licensed, sponsored, authorized or franchised by or are otherwise connected to Plaintiffs;
- (c) engaging in any other activity constituting unfair competition with Plaintiffs; and
- (d) aiding, assisting, or abetting any other party in doing any act prohibited by sub-paragraph (a) through (d)

3. That Defendants will within ten (10) days pending entry of this Order produce a complete and accurate list of all domain names, trademark and service mark applications, and

trademark and service mark registrations owned or held by Defendants or their Affiliates containing Plaintiffs' names or confusingly similar thereto.

4. That Defendants file with the Court and serve on Plaintiffs' counsel within thirty (30) days of the entry of judgment a report in writing under oath setting forth in detail the manner and form in which Defendants' have complied with the requirements of this injunction and Order.

5. That Defendants be ordered to account to Plaintiffs for all gains, profits, savings and advantages realized by Defendants from their acts complained of above.

6. That Defendants be ordered to pay over to Plaintiffs damages, including all the gains, profits, savings and advantages realized by Defendants from their acts of cyberpiracy, and unfair competition.

7. That, if Plaintiffs so elect, Defendants be ordered to pay Plaintiffs statutory damages in the amount of \$100,000 for each infringing or dilutive domain name registered in bad faith by the Defendants.

8. That Plaintiffs be awarded three times the amount of its actual damages incurred by reason of the facts and occurrences alleged herein.

9. That Defendants be ordered to pay Plaintiffs such exemplary damages as the Court finds appropriate.

10. That Plaintiffs be awarded its costs and disbursements in this action, including reasonable attorneys fees.

11. That Plaintiffs be awarded interest, including pre-judgment interest , on the foregoing sums.

12. That Plaintiffs be awarded such other and further relief as this Court may deem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury as to all issues so triable.

Dated: May 22, 2007

Respectfully submitted,



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(212) 571-0505 (fax)
Attorneys Plaintiffs
Dennis Ahlgrim, Tina Sheppard and
Ahlgrim Sheppard, Inc.

EXHIBIT A

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P.O. Box 278
Yarmouth, NS B5A 4B2
CA
Email: 7d3f06cc0a1e672a014fc173d3c51b7e@domaindiscreet.com

Registrar Name....: REGISTER.COM, INC.

Registrar Whois....: whois.register.com
Registrar Homepage: www.register.com

Domain Name: dennisahlgrim.com

Created on.....: Wed, Apr 11, 2007
Expires on.....: Fri, Apr 11, 2008
Record last updated on..: Fri, May 04, 2007

Administrative Contact:

Domain Discreet
ATTN: dennisahlgrim.com
P.O. Box 278
Yarmouth, NS B5A 4B2
CA
Phone: 1-902-7495331
Email: 7d3f06cb0a1e672a00103edbae334e3e@domaindiscreet.com

Technical Contact:

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P.O. Box 278
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CA
Phone: 1-902-7495331
Email: 7d3f06cd0a1e672a00697020f67566b0@domaindiscreet.com

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 P.O. Box 278
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 Email: 7d3d7d720a1e672a005b4625ab2a6cec@domaindiscreet.com

Registrar Name.....: REGISTER.COM, INC.

Registrar Whois...: whois.register.com
Registrar Homepage: www.register.com

Domain Name: ahlgrimdesign.com

Created on.....: Wed, Apr 11, 2007
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Record last updated on..: Fri, May 04, 2007

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 ATTN: ahlgrimsheppard.net
 P.O. Box 278
 Yarmouth, NS B5A 4B2
 CA
 Email: 813334950a1e67280165ec980b95e29d@domaindiscreet.com

Registrar Name....: REGISTER.COM, INC.

Registrar Whois...: whois.register.com
Registrar Homepage: www.register.com

Domain Name: ahlgrimsheppard.net

Created on.....: Thu, Apr 12, 2007
Expires on.....: Sat, Apr 12, 2008
Record last updated on...: Sat, May 05, 2007

Administrative Contact:
Domain Discreet
ATTN: ahlgrimsheppard.net
P.O. Box 278
Yarmouth, NS B5A 4B2
CA
Phone: 1-902-7495331
Email: 813334930a1e672801b8f6ccf467cd45@domaindiscreet.com

Technical Contact:
Domain Discreet
ATTN: ahlgrimsheppard.net
P.O. Box 278
Yarmouth, NS B5A 4B2
CA
Phone: 1-902-7495331
Email: 813334960a1e6728014f24103fb72b5e@domaindiscreet.com

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Domain ID:D143486180-LROR
 Domain Name:AHLGRIMSHEPPARD.ORG

Created On:12-Apr-2007 20:34:48 UTC
Last Updated On:13-May-2007 06:37:51 UTC
Expiration Date:12-Apr-2008 20:34:48 UTC
Sponsoring Registrar:Register.com Inc. (R71-LROR)
Status:CLIENT TRANSFER PROHIBITED
Status:TRANSFER PROHIBITED
Registrant ID:9468674283916122
Registrant Name:Domain Discreet
Registrant Organization:ATTN: ahlgrimsheppard.org
Registrant Street1:P.O. Box 278
Registrant Street2:
Registrant Street3:
Registrant City:Yarmouth
Registrant State/Province:NS
Registrant Postal Code:B5A 4B2
Registrant Country:CA
Registrant Phone:+1.9027495331
Registrant Phone Ext.:
Registrant FAX:
Registrant FAX Ext.:
Registrant
Email:842836010a1e6729000233d40bc71815@domaindiscreet.com
Admin ID:7420946283605619
Admin Name:Domain Discreet
Admin Organization:ATTN: ahlgrimsheppard.org
Admin Street1:P.O. Box 278
Admin Street2:
Admin Street3:
Admin City:Yarmouth
Admin State/Province:NS
Admin Postal Code:B5A 4B2
Admin Country:CA
Admin Phone:+1.9027495331
Admin Phone Ext.:
Admin FAX:
Admin FAX Ext.:
Admin
Email:842836000a1e6729011520141275c10b@domaindiscreet.com
Tech ID:3138915283b6c266
Tech Name:Domain Discreet
Tech Organization:ATTN: ahlgrimsheppard.org
Tech Street1:P.O. Box 278
Tech Street2:
Tech Street3:
Tech City:Yarmouth
Tech State/Province:NS
Tech Postal Code:B5A 4B2
Tech Country:CA
Tech Phone:+1.9027495331
Tech Phone Ext.:

Tech FAX:

Tech FAX Ext.:

Tech Email:842836020a1e6729010cd287ffc28ed2@domaindiscreet.com

Name Server:VESTRY.DATAGRAM.COM

Name Server:VANDAM.DATAGRAM.COM

Name Server:VESEY.DATAGRAM.COM

Name Server:VANDERBILT.DATAGRAM.COM

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Name Server:

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P.O. Box 278
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Email: 7d3f060e0a1e672a01a97115e3db9b1a@domaindiscreet.com

Registrar Name.....: REGISTER.COM, INC.

Registrar Whois...: whois.register.com
Registrar Homepage: www.register.com

Domain Name: ahlgrimshepparddesign.com

Created on.....: Wed, Apr 11, 2007
Expires on.....: Fri, Apr 11, 2008
Record last updated on...: Fri, May 04, 2007

Administrative Contact:

Domain Discreet
ATTN: ahlgrimshepparddesign.com
P.O. Box 278
Yarmouth, NS B5A 4B2
CA
Phone: 1-902-7495331
Email: 7d3f060d0a1e672a0130997ec05c014c@domaindiscreet.com

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Domain Discreet
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CA
Phone: 1-902-7495331
Email: 7d3f060e0a1e672a00a3ce7478e59024@domaindiscreet.com

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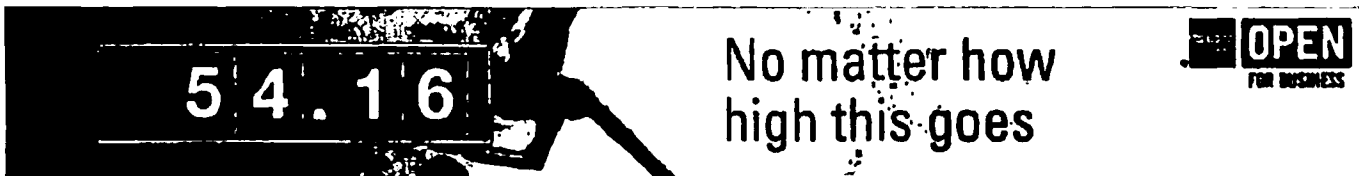
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Email: 7d3d814a0a1e672a01addcca0341170a@domaindiscreet.com

Registrar Name....: REGISTER.COM, INC.

Registrar Whois...: whois.register.com
Registrar Homepage: www.register.com

Domain Name: tinashepparddesign.com

Created on.....: Wed, Apr 11, 2007
Expires on.....: Fri, Apr 11, 2008
Record last updated on...: Fri, May 04, 2007

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